

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THRIVENT FINANCIAL FOR
LUTHERANS,

Plaintiff,

v.

JAMES E. HARRIS; JAMES E. HARRIS,
JR.; ANDREA HARRIS; J.H. (A MINOR),

Defendants.

C.A. No. 3:16-cv-03368-MGL

**Plaintiff's Motion for Appointment of a
Guardian Ad Litem for J.H. (A Minor)**

Pursuant to Rule 17 of the Federal Rules of Civil Procedure, Plaintiff Thrivent Financial for Lutherans (“**Plaintiff**” or “**Thrivent**”) hereby moves for the appointment of a guardian ad litem to represent J.H., a minor, in this matter. In support of this Motion, Thrivent submits the following:

1. In this matter, Thrivent seeks a declaratory judgment regarding the correct beneficiaries of a life insurance policy, which Thrivent had issued to Patricia Harris in February 2008 (“**the Policy**”).

2. In June 2016, shortly before her death, Patricia Harris intended to change the Policy’s beneficiary from her husband, James E. Harris (from whom she was separated at the time), to her children: James E. Harris, Jr., Andrea Harris, and J.H. (a minor). However, the beneficiary change form did not designate all portions of the Policy to be changed, and, as a result, the beneficiary only was changed as to one of the Policy’s two benefits.

3. Thrivent, pursuant to the Complaint, seeks a declaration that Patricia Harris’ attempted change was effective to change the beneficiaries for the entire Policy from her husband to her children.

4. Upon information and belief, J.H. (“**The Minor**”) is a minor under the age of 18 and a resident of Lexington County, South Carolina.

5. Upon information and belief, The Minor is not represented in this action.

6. Accordingly, Thrivent, in accordance with Rule 17 and Local Rule 17.01, respectfully requests that the Court appoint a guardian ad litem to protect the interests of The Minor in connection with this action.

WHEREFORE, pursuant to Rule 17(c) of the Federal Rules of Civil Procedure, Thrivent respectfully requests the appointment of a suitable individual as guardian ad litem to represent the Minor’s interests in this lawsuit.

This the 19th day of January 2017
Greenville, South Carolina

/s/ Catherine Wrenn

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